

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re: City of Detroit, Michigan, Debtor.	Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker Chapter 9
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**STIPULATION FOR ORDER GRANTING BRIEF FURTHER
EXTENSION OF TIME FOR PARTIES TO FILE JOINT MOTION
MEMORIALIZING AND SEEKING APPROVAL OF THEIR
SETTLEMENT REGARDING HEARING ON CITY OF DETROIT'S
OBJECTION TO CLAIM NUMBER 1862 FILED BY
DETROIT POLICE OFFICERS' ASSOCIATION**

The City of Detroit, Michigan (“City”) and the Detroit Police Officers Association (“DPOA”), by their undersigned counsel, hereby stipulate and agree as follows:

1. On October 29, 2019, the City filed the *City of Detroit's Objection to Claim Number 1862 Filed by Detroit Police Officers' Association* [Doc. No. 13152] (“Objection”). On December 11, 2019, the DPOA filed a response to the Objection. [Doc. No. 13193].
2. The Court conducted a hearing on the Objection on February 12, 2020.
3. The Court scheduled a further hearing on the Objection, for the purpose of issuing an oral bench opinion, on March 25, 2020.
4. This Court last held a status conference on this matter on December 16, 2020. At that time, pursuant to a minute entry, the Court, after consulting with the

parties, indicated that the joint motion seeking approval should be filed no later than January 15, 2021. The parties received a subsequent extension to January 29.

5. Between January 15 and 29, the parties have exchanged drafts of the motion and proposed orders. The parties are working to finalize one of the exhibits to the motion, which is an agreement between the DPOA and a qualified claims administrator. Given certain information in the agreement, the agreement may also need to be filed under seal. The parties believe the agreement is close to being finished but they respectfully request that the Court grant a brief additional extension of time until February 3, 2021, to finalize this agreement and to file a motion to have the agreement filed under seal, if necessary.

WHEREFORE, the City and the DPOA respectfully request that the Court enter an order in substantially the same form as the one attached as Exhibit 1 setting the deadline for the parties to file the joint settlement motion until February 3, 2021.

STIPULATED AND AGREED TO ON January 29, 2021:

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EXHIBIT 1

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**ORDER GRANTING FURTHER EXTENSION OF TIME FOR PARTIES
TO FILE JOINT MOTION MEMORIALIZING AND SEEKING
APPROVAL OF THEIR SETTLEMENT REGARDING HEARING ON
CITY OF DETROIT'S OBJECTION TO CLAIM NUMBER 1862 FILED BY
DETROIT POLICE OFFICERS' ASSOCIATION**

Upon the *Stipulation for Order Granting Further Extension of Time for Parties to File Joint Motion Memorializing and Seeking Approval of their Settlement Regarding Hearing on City of Detroit's Objection to Claim Number 1862 Filed by Detroit Police Officers' Association* (Docket # _____, the "Stipulation")¹; the Court finds good cause to enter this Order.

IT IS ORDERED that the deadline for the parties to file their joint motion memorializing and seeking approval of their settlement is extended to February 3, 2021.

¹ Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Stipulation.